

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NELSON L. BRUCE,)
Plaintiff,)
v.) Case No.: 2:22-cv-02211-BHH-MGB
PENTAGON FEDERAL CREDIT UNION)
a/k/a PENTAGON FEDERAL CREDIT)
UNION, EXPERIAN INFORMATION)
SOLUTIONS, INC., TRANS UNION, LLC,)
EQUIFAX INFORMATION SERVICES,)
LLC, LEXISNEXIS RISK SOLUTIONS,)
INC., and UNKNOWN DOES 1-100,)
Defendants.)

DEFENDANT TRANS UNION LLC'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56, Defendant Trans Union LLC (“Trans Union”), by and through its counsel of record, hereby files its Motion for Summary Judgment (“Motion”), and; thereby, moves for an Order granting summary judgment in its favor on all claims asserted by Plaintiff Nelson L. Bruce. Trans Union’s Motion is based on the grounds that the claims in this lawsuit fail as a matter of law. Trans Union’s Memorandum in Support (“Memorandum”) and accompanying exhibits are filed contemporaneously herewith and are incorporated herein by reference. For the reasons and grounds stated in the Memorandum, Trans Union’s Motion should be granted, and judgment should be entered in Trans Union’s favor on all claims.

< SIGNATURE BLOCK IS ON NEXT PAGE >

Respectfully submitted,

s/Wilbur E. Johnson

Wilbur E. Johnson
Federal ID No.: 2212
Clement Rivers, LLP
25 Calhoun Street, Suite 400
Charleston, SC 29401
Tel: (843) 724-6659
Fax: (843) 579-1332
wjohnson@ycrlaw.com
Counsel for Trans Union LLC

Date: April 11, 2025

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of April 2025, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which then sent a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

G. Troy Thames

tthames@wjlaw.net

Willson Jones Carter and Baxley

421 Wando Park Boulevard, Suite 100

Mt Pleasant, SC 29464

(843) 284-0832

and

Michael A. Graziano

mgraziano@eckertseamans.com

Sarah A. James

sjames@eckertseamans.com

Eckert Seamans Cherin & Mellott LLC

1717 Pennsylvania Avenue NW, Suite 1200

Washington, DC 20006

(202) 659-6671

***Counsel for Pentagon Federal Credit
Union a/k/a Pentagon Federal Credit
Union Foundation***

Rita Bolt Barker

rbarber@wyche.com

Wyche PA

200 E. Broad Street, Suite 400

Greenville, SC 29601-2892

(864) 242-8235

and

Eric F. Barton

ebarton@seyfarth.com

Seyfarth Shaw LLP

1075 Peachtree Street NE, Suite 2500

Atlanta, GA 30309

(404) 885-1500

Counsel for Equifax

Information Services, LLC

Lyndey Ritz Zwing Bryant

lyndey.bryant@arlaw.com

Grant Edward Schnell

gschnell@jonesday.com

Adams & Reese LLP

1221 Main Street, Suite 1200

Columbia, SC 29201

(803) 212-4958

***Counsel for Experian
Information Solutions, Inc.***

William Joseph Farley, III

will.farley@troutman.com

Troutman Sanders LLP

301 S Tryon Street, Suite 3400

Charlotte, NC 28202

(704) 998-4099

and

Derek Michael Schwahn

derek.schwahn@troutman.com

Troutman Pepper Hamilton

Sanders LLP

600 Peachtree Street NE, Suite 3000

Atlanta, GA 30308

(404) 885-3124

and

Celeste Tiller Jones

ctjones@burr.com

Burr & Forman

1221 Main Street, Suite 1800

Columbia, SC 29201

(803) 799-9800

***Counsel for LexisNexis Risk
Solutions, Inc., and LexisNexis
Risk Data Management Inc.***

I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

Nelson L. Bruce
PO Box 3345
Summerville, SC 29484-3345
Pro Se Plaintiff

WILBUR E. JOHNSON